

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
:
ABRAHAM and MINA REMBAUM, *et.* :
al., :
:

Plaintiffs,

No. 10-CIV-4095 (SAS)

vs.

BANCO SANTANDER, S.A., BANCO
SANTANDER INTERNATIONAL,
OPTIMAL INVESTMENT SERVICES,
S.A., and JONATHAN CLARK,

Defendants.
:
:
-----X

**BANCO SANTANDER, S.A.'S, BANCO SANTANDER INTERNATIONAL'S,
AND OPTIMAL INVESTMENT SERVICES, S.A.'S
RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

Pursuant to Fed. R. Civ. P. 7.1, Defendants, Banco Santander S.A., Banco Santander International, and Optimal Investment Services, S.A. state that:

1) Banco Santander, S.A. is a publicly-traded company. Banco Santander S.A. has no parent company and no publicly-traded company owns ten percent or more of its stock.

2) Banco Santander International is ultimately a wholly-owned subsidiary of Banco Santander, S.A.

3) Optimal Investment Services, S.A. is ultimately a wholly-owned subsidiary of Banco Santander, S.A.

Dated: January 3, 2011

Respectfully submitted,

By: /s/ Paulo R. Lima

Samuel A. Danon (*pro hac vice*)

Gustavo J. Membiela (*pro hac vice*)

Paulo R. Lima

HUNTON & WILLIAMS LLP
1111 Brickell Avenue, Suite 2500
Miami, FL 33131
Telephone: (305) 810-2500
Facsimile: (305) 810-2460
Email: sdanon@hunton.com
Email: gmembiela@hunton.com
Email: plima@hunton.com

- and -

Shawn Patrick Regan
HUNTON & WILLIAMS LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 309-1000
Facsimile: (212) 309-1100
Email: sregan@hunton.com

*Counsel for Defendants Banco Santander, S.A., Banco
Santander International, Optimal Investment Services,
S.A., and Jonathan Clark*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 3, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to counsel of record listed below:

Edward W. Miller, Esq.
648 Franklin Avenue, 2nd Floor
Garden City, New York 11530
Counsel for Plaintiffs

/s/ Paulo R. Lima
For Hunton & Williams LLP